

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA, ) CRIM. NO. 04-30032-MAP  
vs. )  
FRANCIS G. KEOUGH, III )  
Defendant. )

GOVERNMENT'S MOTION FOR REVIEW

Pursuant to Title 18, United States Code, Section 3145(a), the United States of America respectfully moves this Court to review the magistrate court's denial of the Government's motion to detain defendant Francis G. Keough, III for violating his conditions of release pursuant to Title 18, United States Code, Sections 3148(b)(1)(A) and (b)(2)(A) and (B), and the magistrate court's subsequent amendment of the defendant's conditions of release.

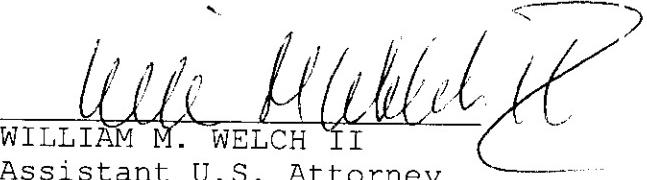
Title 18, United States Code, Section 3145(a) requires a district court's review of an order of release to be done "promptly." The Government understands that U.S. District Judge Ponsor is on vacation next week. Therefore, the Government requests that this motion be heard before the district court in Worcester. The Government intends to present evidence at this subsequent hearing.

Dated this 29<sup>th</sup> day of July, 2005.

Respectfully submitted,

MICHAEL P. SULLIVAN  
United States Attorney

By:

  
WILLIAM M. WELCH II  
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

Hampden, ss.

Springfield, Massachusetts  
July 29, 2005

I, William M. Welch, Assistant U.S. Attorney, do hereby certify that I have served a copy of the foregoing by faxing said motion to:

Jack St. Clair, Esq.  
73 Chestnut Street  
Springfield, MA 01105

  
WILLIAM M. WELCH II  
Assistant United States Attorney